

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

GRETCHEN S. STUART, M.D., et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION
	)	
RALPH C. LOOMIS, M.D., et al.,	)	Case No. 1:11-cv-00804
	)	
Defendants.	)	

**PLAINTIFFS' NOTICE OF INTENT TO FILE DISPOSITIVE MOTION**

Plaintiffs, Gretchen S. Stuart, M.D., *et al.*, through counsel, pursuant to L.R. 56.1(a), hereby give notice of their intention to file a motion for summary judgment under Rule 56 of the Federal Rules of Civil Procedure in the above captioned matter.

Dated: August 31, 2012

Respectfully submitted,

/s/ Christopher Brook  
Christopher Brook  
NC Bar #33838  
Legal Director  
American Civil Liberties Union  
of North Carolina Legal Foundation  
P.O. Box 28004  
Raleigh, NC 27611  
(919) 834-3466  
(866) 511-1344 Fax  
cbrook@acluofnc.org

/s/ Julie Rikelman  
Julie Rikelman  
Center for Reproductive Rights  
120 Wall Street, 14th Floor  
New York, NY 10005  
(917) 637-3670  
(917) 637-3666 Fax  
jrikelman@reprorights.org

COUNSEL FOR ALL PLAINTIFFS

Helene T. Krasnoff  
Planned Parenthood Fed. Of America  
1110 Vermont Avenue NW, Suite 300  
Washington, DC 20005  
(202) 973-4800  
helene.krasnoff@ppfa.org

Diana O. Salgado  
Planned Parenthood Fed. of America  
434 W. 33<sup>rd</sup> Street  
New York, NY 10001  
(212) 541-7800  
(212) 247-6811 Fax  
diana.salgado@ppfa.org

COUNSEL FOR PLANNED  
PARENTHOOD OF CENTRAL NORTH  
CAROLINA & PLANNED PARENTHOOD  
HEALTH SYSTEMS, INC.

Andrew D. Beck  
Staff Attorney  
American Civil Liberties Union  
Foundation  
125 Broad Street  
New York, NY 10004  
(212) 284-7318  
(212) 549-2651 Fax  
abeck@aclu.org

COUNSEL FOR JAMES R. DINGFELDER,  
M.D., SERINA FLOYD, M.D., TAKEY  
CRIST, M.D., & TAKEY CRIST M.D., P.A.  
d/b/a CRIST CLINIC FOR WOMEN

Walter Dellinger  
Laura Conn  
O'Melveny & Myers LLP  
1625 Eye Street NW  
Washington, DC 20006  
(202) 383-5300  
(202) 383-5414 Fax  
wdellinger@omm.com  
lconn@omm.com

Anton Metlitsky  
O'Melveny & Myers LLP  
Times Square Tower  
7 Times Square  
New York, NY 10036  
(212) 326-2000  
(212) 326-2061 Fax  
ametlitsky@omm.com

COUNSEL FOR GRETCHEN S. STUART,  
M.D., DAVID A. GRIMES, M.D., AMY  
BRYANT, M.D., DECKER & WATSON  
d/b/a PIEDMONT CAROLINA MEDICAL  
CLINIC, & A WOMAN'S CHOICE OF  
RALEIGH, INC.

**CERTIFICATE OF SERVICE**

I hereby certify that on the 31<sup>st</sup> day of August, 2012, I electronically filed the foregoing PLAINTIFFS' NOTICE OF INTENT TO FILE DISPOSITIVE MOTION with the clerk of the court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Christopher Brook  
Christopher Brook  
NC Bar #33838  
Legal Director  
American Civil Liberties Union  
of North Carolina Legal Foundation  
P.O. Box 28004  
Raleigh, NC 27611  
(919) 834-3466  
(866) 511-1344 Fax  
cbrook@acluofnc.org